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## ATTORNEY FOR WASHOE COUNTY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

DREW RIBAR,

Plaintiff,

Case No. 3:24-cv-00526-ART-CSD

vs.

WASHOE COUNTY, NEVADA; WASHOE COUNTY LIBRARY SYSTEM; BUILD OUR CENTER, INC.; JEFF SCOTT; STACY MCKENZIE; JONNICA BOWEN; LIBRARY EMPLOYEE DOE #1; JENNIFER COLE; DEPUTY C. ROTHKIN (BADGE #5696); DEPUTY R. SAPIDA (BADGE #4663; SGT. GEORGE GOMEZ (BADGE #4066); AND JOHN/JANE DOES 1+10,

[PROPOSED] STIPULATED  
DISCOVERY PLAN AND SCHEDULING  
ORDER SUBMITTED IN COMPLIANCE  
WITH LR 26-1(b)

## Defendants.

COMES NOW, Defendants Washoe County, Washoe County Library System, Jeff Scott, Stacy McKenzie, Jonnica Bowen, Jennifer Cole, Deputy Rothkin, Deputy Sapida, Sergeant Gomez (collectively “County Defendants”), by and through counsel, and Plaintiff Drew Ribar, *pro se*, and hereby submit this proposed stipulated discovery plan and scheduling order pursuant to the Local Rules of Practice, LR 26-1 and Fed. R. Civ. P. 26(f).

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1                   Discovery Plan Requirements - Fed. R. Civ. P. 26(f)(3)

2                   (A) *Initial Disclosures:*

3                   The parties will exchange initial disclosures on or before their Rule 26(f) conference on  
4 January 3, 2025.

5                   (B) *The subjects on which discovery may be needed, when discovery should be completed, and whether*  
6 *discovery should be conducted in phases or be limited to or focused on particular issues:*

7                   It is anticipated that discovery will focus on Plaintiff's claims and the parties will  
8 exchange documents relating thereto. The parties anticipate being able to complete discovery  
9 in 180 days.

10                  (C) *Any issues about disclosure, discovery, or preservation of electronically stored information,*  
11 *including the form or forms in which it should be produced:*

12                  No known issues at this time.

13                  (D) *Any issues about claims of privilege or of protection as trial-preparation materials, including—if*  
14 *the parties agree on a procedure to assert these claims after production—whether to ask the Court to include*  
15 *their agreement in an order under Fed. R. Ev. 502:*

16                  No known issues at this time.

17                  (E) *What changes should be made in the limitations on discovery imposed under these rules or by local*  
18 *rule, and what other limitations should be imposed:*

19                  No known issues at this time.

20                  (F) *Any other orders that the court should issue under Rule 26(c)(protective orders) or under Rule*  
21 *16(b)(scheduling) and 16(c)(pretrial conferences):*

22                  No known orders at this time.

23                   Discovery Plan Requirements - LR 26-1(b)(1)

24 (1)               The discovery deadline shall not be longer than 180 days from the date the first  
25 defendant answers or appears.

26                  *Discovery Cut-off: June 9, 2025*

1 (2) The deadline for filing motions to amend the pleadings or to add parties is 90 days  
2 before the close of discovery.

3 *Amending Pleadings and Adding Parties: March 11, 2025*

4 (3) Expert disclosures be made 60 days before the discovery cut-off date and rebuttal-  
5 expert disclosures be made 30 days after the initial disclosure of experts.

6 *Expert Disclosures per Fed. R. Civ. P. 26(a)(2): April 10, 2025*

7 *Rebuttal Expert Disclosure: May 12, 2025*

8 (4) The deadline for filing dispositive motions is 30 days after the discovery cut-off date.

9 *Dispositive Motions: July 9, 2025*

10 (5) The deadline for the joint pretrial order is 30 days after the dispositive-motion deadline.

11 *Pretrial Order: August 8, 2025*

12 If dispositive motions are filed, the deadline for filing the joint pretrial order will be  
13 suspended until 30 days after decision on the dispositive motions or further court order.

14 (6) The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections thereto shall be  
15 made in the joint pretrial order.

16 (7) The undersigned parties hereby certify that they will meet and confer about the  
17 possibility of using alternative dispute-resolution processes including mediation, arbitration,  
18 and if applicable, early neutral evaluation at the FRCP 26(f) conference on January 3, 2025.

19 (8) The undersigned parties hereby certify that will consider consent to trial by a  
20 magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial  
21 Program (General Order 2013-01) at the FRCP 26(f) conference on January 3, 2025.

22 (9) The undersigned parties hereby certify that they will discuss whether they intend to  
23 present evidence in electronic format to jurors for the purposes of jury deliberations. At this  
24 time, the parties have not reached any stipulations regarding providing discovery in an  
25 electronic format compatible with the court's electronic jury evidence display system.

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*Extensions or Modifications of the Discovery Plan and Scheduling Order:* Applications to extend or modify must be made no later than 21 days prior to the deadline sought to be extended and must be supported by a showing of good cause and include the requirements outlined in LR 26-3(a)-(d).

IT IS SO STIPULATED.

Dated: December 23, 2024

Dated: December 23, 2024

MICHAEL W. LARGE  
Deputy District Attorney

DREW RIBAR  
*Prose*

/s/ Michael W. Large  
Attorney for Defendant

/s/ Drew Ribar  
Plaintiff

IT IS SO ORDERED.

## United States District/Magistrate Judge

DATED:

## CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, I deposited for mailing in the U.S. Mails, with postage fully prepaid, a true and correct copy of the foregoing document in an envelope addressed to the following:

Drew Ribar

Dated this 23rd day of December 2024.

/s/ C. Theumer

C. Theumer